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**From:** Rose Kachadoorian [rkachadoorian@oda.state.or.us]  
**Sent:** 10/31/2018 7:47:25 PM  
**To:** Hopkins, Yvette [Hopkins.Yvette@epa.gov]  
**CC:** Mosby, Jackie [Mosby.Jackie@epa.gov]; Herndon, George [Herndon.George@epa.gov]; Zimmerman, Dea [Zimmerman.Dea@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]  
**Subject:** Re: SFIREG Contaminant Issue Paper PR 96-8, response to query

We only became aware of this issue related to PRN 96-8 because there was sampling on 100% of a particular crop grown. The crop happened to be cannabis, but it could have been on any crop in which there was frequent sampling.

The allowance of undeclared pesticide contamination in pesticide products may explain situations in which our agency could not find the source of a pesticide on a crop when there was no tolerance.

I still remember the case of the long-time organic grower attempting to market his kale crop to a large organic box store; it was rejected because it had detectable levels of chlorothalonil. Unfortunately, there is not a tolerance for chlorothalonil on kale, so the crop could not be marketed to conventional markets and it was therefore destroyed. At the time, we could not find the source of the chlorothalonil. But now we know to analyze his "organic" pesticides.

Bottomline: These undeclared pesticide contaminants in some cases are detectable in harvested crops. This is particularly problematic when there is no tolerance, or phytotoxicity could occur.

Thank you

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On Oct 29, 2018, at 12:55 PM, Hopkins, Yvette <[Hopkins.Yvette@epa.gov](mailto:Hopkins.Yvette@epa.gov)> wrote:

Jackie,

I spoke with Rose K. this afternoon who confirmed that SFIREG believes these problems are not limited to cannabis and they do expect effort on this in the near future, which at a minimum they believe is the NOP and over-the-top herbicide exclusions added to the PR.

Please let me know how to proceed.

Thanks.

Yvette

